



Alliance for Telecommunications
Industry Solutions

*Problem Solvers to the
Telecommunications Industry*

1200 G Street, N.W.
Suite 500
Washington, D.C. 20005

202-628-6380
Fax: 202-393-5453

Chairman
Casimir S. Skrzypczak
NYNEX Corporation

First Vice Chairman
James M. Johnson
Standard Telephone Co.

Second Vice Chairman
Terry J. Yake
Sprint Corporation

Treasurer
Gregory L. Theus
GTE Telephone Operations

President
George L. Edwards
ATIS

Vice President & General Counsel
Susan M. Miller
ATIS

COMMITTEES



Committee T
Telecommunications



Carrier Liaison Committee



Telecommunications
Industry Forum



Information Industry
Liaison Committee



Protection Engineers Group



Standards Committee OS



Electronic Communications
Service Provider Committee



Network Reliability
Steering Committee

May 19, 1995

RECEIVED

MAY 19 1995

DOCKET FILE COPY ORIGINAL

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 95-20: In The Matter of Computer III
Remand Proceedings: Bell Operating Company Provision of
Enhanced Services, FCC 95-48; Released February 21,
1995.

Dear Mr. Caton:

Enclosed herewith please find an original and nine (9) copies of the
reply comments of the Information Industry Liaison Committee
under the auspices of the Alliance for Telecommunications Industry
Solutions, Inc., in the above-referenced proceeding.

If you have any questions, please call me at (202) 434-8828.

Sincerely,

Susan M. Miller
Vice President and General Counsel

cc: Ms. Peggy Reitzel, Policy and Program
Planning Division - Common Carrier Bureau
International Transcription Services

No. of Copies rec'd
List A B C D E

04 9

RECEIVED

MAY 19 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Computer III Further Remand
Proceedings: Bell Operating
Company Provision of Enhanced
Services

)
)
)
)
)
)

CC Docket No. 95-20

DOCKET FILE COPY ORIGINAL

**REPLY COMMENTS OF THE
INFORMATION INDUSTRY LIAISON COMMITTEE**

Susan M. Miller, Vice President
and General Counsel
Alliance for Telecommunications
Industry Solutions, Inc.
1200 G Street, N.W., Suite 500
Washington, D.C. 20005

IILC Chair - Donald S. Radovich

May 19, 1995

SUMMARY

By these reply comments, the Information Industry Liaison Committee ("IILC"), as sponsored by the Alliance for Telecommunications Industry Solutions, is responding generally to the comments raised with respect to its processes and procedures, and its effectiveness, as well as to address specifically those concerns with respect to :1) acceptance of issues by the IILC; 2) voluntary participation in the IILC; and 3) the meaning of consensus in the IILC. The IILC takes no position as to the merits of any of the concerns raised about its processes in the comments filed in this proceeding.

Chartered in 1987, the IILC serves as an interindustry mechanism for the discussion and voluntary resolution of industry wide concerns related to Open Network Architecture ("ONA") and/or local network interactivity. The IILC structure consists of the full committee, an Interindustry Advisory Group ("IAG"), and issue specific Task Groups.

Resolution of issues in the IILC and its Task Groups is by consensus which is established when substantial agreement (i.e., more than a simple majority, but not necessarily unanimity) has been reached among the materially affected industry groups participating in the issue at hand. Consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objections. In other cases, the opinion of the minority may, upon request, be recorded with the substantial agreement (i.e., the consensus) of the majority.

The IILC issue resolution process is called the "going-going-gone" process. The first "going" occurs when the full IILC reaches an initial consensus resolution. The second "going" occurs after the Interindustry Advisory Group reviews the initial resolution for procedural fairness. The final "gone" step signifies that the issue has the final consensus approval of the full

IILC and may be distributed as a sanctioned IILC position.

As respects the IILC's acceptance of issues, all matters presented to the IILC will be addressed. However, only those issues which are related to the mission and scope of the IILC's work will be substantively discussed. If the proposed issue does not meet these requisites, the IILC has historically accepted these issues on a provisional basis to see, if perhaps, some aspect of the issue may warrant IILC deliberations.

Participation in the IILC is voluntary. At no time is a participant required to submit an issue or a contribution in support of an issue. The IILC does not control which services are offered by the participating companies; nor does it control how services are offered. When the IILC reaches consensus, it believes that its participants are committed to consider IILC resolutions in good faith.

IILC consensus signifies that the IILC has systematically reviewed an issue, sought to address it in a professional matter that meets the needs of the originator, and has reached substantial agreement on findings, recommendations, and/or technical descriptions of possible services. Whether the consensus reached is a result of the issue resolution process or the IILC's Systematic Uniformity Process, the agreement is not an agreement by the participants to uniformly implement the proposed service nor the technology on a national basis. The IILC submits that it does not intend and never has intended to usurp a participating company's ability to make independent business judgments and implementation plans.

The IILC believes that its process, by design, affords a full and fair opportunity for all interested parties to raise and discuss issues, views, objections, and concerns before reaching final agreement on the outcome of a matter.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	CC Docket No. 95-20
<u>Computer III</u> Further Remand)	
Proceedings: Bell Operating)	
Company Provision of Enhanced)	
Services)	

**REPLY COMMENTS OF THE
INFORMATION INDUSTRY LIAISON COMMITTEE**

TABLE OF CONTENTS

	<u>Page</u>
SUMMARY.....	i
I. OVERVIEW OF THE IILC AND ITS PROCESSES.....	2
II. ACCEPTANCE OF ISSUES BY THE IILC.....	6
III. VOLUNTARY PARTICIPATION IN THE IILC.....	7
IV. THE MEANING OF CONSENSUS IN THE IILC.....	9
CONCLUSION.....	11

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	CC Docket No. 95-20
<u>Computer III</u> Further Remand)	
Proceedings: Bell Operating)	
Company Provision of Enhanced)	
Services)	

**REPLY COMMENTS OF THE
INFORMATION INDUSTRY LIAISON COMMITTEE**

The Information Industry Liaison Committee ("IILC"), as sponsored by the Alliance for Telecommunications Industry Solutions, Inc. ("ATIS"), hereby files these reply comments with the Federal Communications Commission ("FCC" or "Commission") in CC Docket No. 95-20, Notice of Proposed Rulemaking ("NPRM"), In the Matter of Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services (Adopted: February 7, 1995; Released: February 21, 1995).¹

¹ The IILC's reply comments reflect the consensus views of its participants. As such, this means that the views expressed herein represent substantial agreement reached by the directly and materially affected participants in the IILC, both from the local exchange carrier and non-local exchange carrier communities. As per the IILC By-laws, substantial agreement is more than a simple majority but not necessarily unanimity. See Attachment B, IILC Handbook (November, 1994), Section II, By-laws - Section 6.2 Consensus Resolution, (1).

By these reply comments,² the IILC intends to respond generally to the comments raised regarding its processes and procedures, and its effectiveness, as well as address specifically those concerns with respect to: 1) acceptance of issues by the IILC; 2) voluntary participation in the IILC; and 3) the meaning of consensus in the IILC.³

I. OVERVIEW OF THE IILC AND ITS PROCESSES

Chartered in 1987, the IILC serves as an interindustry mechanism for the discussion and voluntary resolution of industry-wide concerns related to Open Network Architecture ("ONA") and/or local network interactivity. ATIS agreed to sponsor the IILC at the request of the Regional Bell Operating Companies ("RBOCs") who learned from non-exchange carriers that there was a common need for an ongoing forum in which interested parties could come together and discuss ONA issues.⁴

The organizational structure of the IILC consists of the full committee, an Interindustry Advisory Group ("IAG"), and issue-specific Task Groups. The full IILC is the deliberative body in which final consensus is reached. It also performs other functions such as being the primary

² A list of the parties, other than the IILC, filing direct comments is contained in Attachment A. These reply comments employ the abbreviations contained in Attachment A in referring to the comments of the parties in this proceeding (e.g., "Comments of ATSI, at p.__").

³ See Comments of ATSI, at 2; Comments of Hatfield Associates, at 11; Comments of ITA generally; Comments of MCI, at 9, 32, including the affidavit of Peter Guggina, at 4-8; and Comments of Prodigy, at 4.

⁴ ATIS (formerly, the Exchange Carriers Standards Association) sponsors a number of industry committees and forums created for the purpose of reaching consensus resolutions on important and at times, contentious telecommunications issues. In its role as sponsor for each of these committees and forums, ATIS ensures that proper procedures are followed for the development of consensus. In this regard, strict adherence to the principles of openness and due process is required.

place where ONA and/or local network interactivity issues are introduced and further defined, as well as performing ongoing issue review, and being a source of industry presentations and tutorials.

The IAG supervises the administrative, procedural, and logistical functions of the IILC. It also reviews recommendations from the Task Groups for adherence to the IILC By-laws and procedures. It is representative of the IILC in that its membership consists of nine positions, four representatives from the local exchange carrier ("LEC") industry and five representatives selected from the non-LEC participating industry groups. Alternates are also selected for each position.⁵

The Task Groups develop recommendations and consensus resolutions for issues assigned by the full IILC or for those issues directly raised by participants on the Task Groups.

Resolution of issues in the IILC and its Task Groups is by consensus which is established when substantial agreement (i.e., more than a simple majority, but not necessarily unanimity) has been reached among the materially affected industry groups participating in the issue at hand. As employed by the IILC, consensus requires that all views and objections be considered, and that a concerted effort be made toward their resolution. Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objections. In other cases, the opinion of the minority may, upon request, be recorded with the substantial agreement (i.e., the

⁵ The details of the IILC's organization and the corresponding responsibilities of the groups in its subtending structure are in Attachment B, the IILC Handbook - Section II, By-laws Section III, at 3.1-3.4. The non-LEC industry groups include participants from the following industry segments: enhanced service providers, manufacturers, interexchange carriers, and end users. It should be noted that currently two (2) of the IAG non-LEC representative positions and five (5) of the alternate non-LEC positions are vacant. The LEC representatives have one (1) vacancy and one (1) alternate vacancy on the IAG. It may be the case that any position on the IAG remains vacant at any given time, although efforts are made to have a full IAG.

consensus) of the majority.

The IILC issue resolution process is called the "going-going-gone" process. It begins when an industry representative brings a specific request or "strategic" issue before the full IILC for consideration. New issues can also be presented initially to the IAG or to a Task Group which will subsequently refer these to the full IILC. The issue originator describes the nature of the request to the IILC participants, who debate whether the issue is an appropriate one for the IILC to investigate. When the IILC accepts a new issue, it is on a pending basis until its Task Group presents a formal issue statement to the IILC. An issue receives a reference number, and a volunteer LEC or non-LEC co-champion is solicited to join the issue originator in leading a Task Group to investigate the issue.

Task Groups consist of issue co-champions, one LEC representative and one non-LEC representative, subject matter experts, and other interested parties. Substantive review of an issue is done at the Task Group level with Task Group progress on issues reported to and tracked by the IAG, and periodic status reports presented to the full IILC. The IILC provides feedback to these issue status reports until the IILC reaches initial consensus on the Task Group's proposed final resolution documentation. When that initial consensus is reached by the full IILC, the first "going" has occurred. This gives the industry an opportunity to review the Task Group's initial resolution before the issue is considered complete.

This initial consensus resolution is also forwarded to the IAG where it is reviewed for procedural fairness. This second step -- review for procedural fairness -- is considered the second "going" in the process. It is the IAG's role in this part of the review to ensure that participants were afforded due process in the resolution of the issue.

Upon completion of the review for procedural fairness, the issue resolution is forwarded to the full IILC for final consensus or remanded to the Task Group to correct identified deficiencies. Only issues that have gained final consensus approval by the full IILC may be adopted and distributed as sanctioned IILC positions. This is the "gone" step and signifies completion of the issue. Of course, if any participant has any concerns with the proposed resolution of an issue at any step of the process, whether it be a substantive concern with the proposed resolution, or a procedural concern with the handling of the issue in the IILC process, they are encouraged to submit written comments for further consideration. Until consensus is reached on these comments, the issue shall be held in its initial "going" status.⁶

The IILC's process, by design, affords a full and fair opportunity for all interested parties to raise and discuss issues, views, objections, and concerns before reaching final agreement on the outcome of a matter. The IILC takes no position as to the merits of any of the concerns raised about its processes in the comments filed in this proceeding.⁷ However, the IILC respectfully submits that certain aspects of its processes warrant further detail so as to clarify any misunderstandings or confusion which may exist regarding the IILC processes in general or as these relate to the specific matters of issue acceptance, voluntary participation, and the meaning of consensus as elaborated on below.

⁶ A diagram of the path an issue takes through the IILC consensus process can be found in the first Appendix of the IILC Handbook, Attachment B.

⁷ See e.g., comments of ATSI, at 2; comments of GeoNet generally; comments of Hatfield Associates, at 11; comments of ITA generally; comments of MCI, at 9, 32, Affidavit of Peter Guggina, at 4-8; and comments of Prodigy, at 4.

II. ACCEPTANCE OF ISSUES BY THE IILC

The IILC was established to facilitate the exchange of information on network capabilities related to ONA and/or local network interactivity. Importantly, all matters presented to the IILC will be addressed. However, only those issues which are ONA-related or deal with local network interactivity, and which are industry-wide in scope will be substantively discussed by the IILC.⁸

Upon acceptance of an issue, the IILC will normally designate it as "provisional," and the Task Group will make necessary revisions or modifications to the issue statement as needed. "Provisional" acceptance does not preclude initiation of work on the issue by the Task Group but indicates only that some aspect(s) of the issue statement needs clarification, modification or additions. The provisional designation may be removed by the IILC at its next review of the issue in a regular meeting.

If an issue as initially submitted does not meet the requisites, that is, it is not ONA-related, nor does it deal with local network interactivity as per the IILC By-laws, the IILC, historically, has also provisionally accepted such issues to afford both the originator of the issue and the participants the opportunity to further discuss the matter to see, if perhaps, some aspect of the issue or a redefinition of the issue would warrant the IILC's deliberations. If it cannot be recharacterized so that it is appropriate for IILC consideration, then it is determined to be outside the scope of the IILC's activities. However, even in this case, the IILC participants often provide guidance to the originator as to where the issue/concern might be appropriately addressed. Sometimes this guidance will be a suggestion to seek one-on-one discussions with IILC participating companies or to take the issue to another industry forum.

⁸ See Attachment B, IILC By-laws, Section II, 2.2-2.3.

Issues within the scope of the IILC's activities are accepted based upon consensus.

Consensus requires that all views and objections be noted and considered, and that a concerted effort be made toward their resolution. In ascertaining whether consensus has been reached, it is the responsibility of the individual moderating the discussions to ensure that the consensus is a fair representation of the various industry groups participating in the discussion and resolution process.⁹

In all cases, meeting minutes are kept to provide a full record of discussions on the IILC's treatment of issues being introduced, including any changes which were made to the issue to bring it within the scope of the IILC so that it is suitable for IILC consideration.

III. VOLUNTARY PARTICIPATION IN THE IILC

As part of its adherence to the principles of openness and due process, it is recognized and understood that participation in the IILC is voluntary. The voluntary nature of participation cuts across several aspects of the IILC's activities. First, interested participants are invited and encouraged to submit issues and contributions. It is expected that the issue originator or a volunteer on behalf of the originator will bring a new issue to an IILC meeting for acceptance into the IILC process. Though issue originators need not attend the IILC meeting when an issue is submitted for acceptance by the IILC, it is highly recommended they do so. It is expected that the originator will participate actively in the proceedings through issue resolution.¹⁰ At no time,

⁹ Note that a party or parties who do not believe that the consensus reached is a fair representation of the participating industry groups may appeal the consensus resolution to the IAG and the full IILC.

¹⁰ The IILC makes an effort to accommodate those times when an issue champion cannot be present by deferring discussions until the next available meeting, recognizing of course that this may delay important work moving forward.

however, is a participant required to submit an issue or a contribution in support of an issue. By way of example, some participants, for valid business reasons (e.g., the information is sensitive and/or proprietary), may refrain from disclosing such information in a public, open arena like the IILC.

Second, when a consensus resolution is reached, its implementation is voluntary. Implementation of IILC findings and/or recommendations is left up to the individual participants, companies, and entities that participate in the IILC.¹¹

The IILC does not control which services are offered by the participating companies; nor does it control how services are offered. When consensus is reached, the IILC believes that its participants are committed to consider the IILC resolutions in good faith.

IV. THE MEANING OF CONSENSUS IN THE IILC

As previously stated, IILC consensus is established when substantial agreement has been reached by directly and materially affected industry groups.¹² IILC consensus signifies that the IILC has systematically reviewed an issue, sought to address it in a professional manner that

¹¹ In its resolution of Issue #022, *Unbundling Criteria*, September 12, 1991, the IILC agreed upon seven criteria for LECs to consider in evaluating ESP requests for specific services and network capabilities: 1) utility to enhanced service providers; 2) technical feasibility; 3) economic feasibility - market demand and cost considerations; 4) regulatory feasibility; 5) legal feasibility; 6) LEC public policy feasibility; and 7) other (this category provides LECs with the flexibility to address circumstances that are not addressed above). The IILC also recognizes that in the Computer III Inquiry, the FCC also established four criteria for the Bell Operating Companies to consider in reaching their decisions on unbundling: 1) expected utility as perceived by ESPs; 2) market demand; 3) costing feasibility; 4) and technical feasibility. However, the FCC did not define these factors, and it did not provide explicit guidelines for their application.

¹² Under some circumstances, consensus is achieved when the minority no longer wishes to articulate its objections. In other cases, the opinion of the minority may, upon request, be recorded with the substantial agreement of the majority.

IILC has systematically reviewed an issue, sought to address it in a professional manner that meets the needs of the originator, and has reached substantial agreement on findings, recommendations, and/or technical descriptions of possible services.¹³ A finding and/or recommendation for a service request that has received IILC consensus provides participants with documentation that can be used in the public domain or in interaction with individual companies or entities. The IILC submits, however, that a consensus resolution does not mean that a uniform national solution will be implemented.

The IILC has developed and utilizes the Systematic Uniformity Process¹⁴ to provide a systematic framework to facilitate the uniform development and deployment of new ONA services and capabilities. The Systematic Uniformity Process does not, however, dictate the application of the uniform service request. Implementation is an individual company decision. The IILC submits that achieving uniformity is part of the process. However, at the heart of the Systematic Uniformity Process is the description being requested by the service provider. The goal of the service request is to be as complete a technical description as possible so that a network provider may respond whether it would be technically feasible to implement the request. The process requires "give-and-take" by both interests.¹⁵

Thus, consensus, whether it be as a result of the IILC's issue resolution process, or in the

¹³ See Attachment B, IILC Handbook-Section II, By-laws, Section VI, 6.2(4).

¹⁴ IILC Issue #021, "A Systematic Approach to Uniformity of ONA Services," adopted by the IILC October 17, 1990.

¹⁵ See Attachment B, IILC Handbook-Section III, Administrative Procedures, specifically, IILC Administrative Procedure 010 which sets forth the steps for service request documentation.

specific context of the IILC's Systematic Uniformity Process, is not an agreement by the participants to uniformly implement the proposed service nor the technology on a national basis. The IILC submits that it does not intend and never has intended to usurp a participating company's ability to make independent business judgments and implementation plans.

The consensus process used by the IILC requires that a concerted effort be made toward resolution, including the consideration of all views and objections. The more complex the issue is and depending on its nature, the longer it may take to reach consensus.

The IILC has gone so far as to develop suggested timeframes for issue resolution based on its experience that issues before the IILC can be broadly grouped into four classifications: 1) education/discussion; 2) specific service requests; 3) position/action by IILC participants (non-service specific); and 4) IILC position/action by external organizations. The proposed timeframes for each group, ranging from two (2) months to twelve (12) months are tools developed by the IILC to afford timely and effective management of issues.¹⁶ The IILC recognizes that in certain limited instances, there may be no agreement. However, the IILC submits that there is a substantial record of successfully resolved issues which supports the IILC's process as a viable means by which to continue to reach resolution.¹⁷ Participants are given an opportunity to share their positions, exchange important information, and have in-depth discussions of the issues. In this regard, the IILC is and can continue to be an effective place to address issues related to ONA and local network interactivity.

¹⁶ See Attachment B, IILC Handbook-IILC Administrative Procedures, Section III-IILC Administrative Procedures 006, IV.

¹⁷ See Attachment B, IILC Handbook-Appendices: Issue Reference.

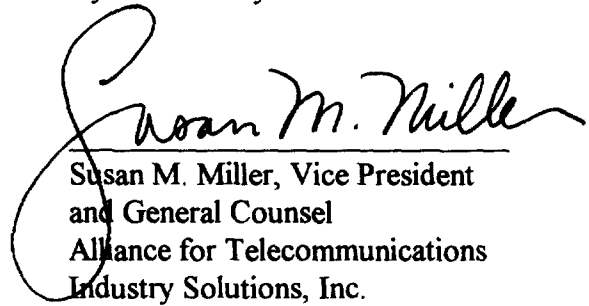
CONCLUSION

For the foregoing reasons, the IILC respectfully submits these reply comments in an effort to respond to comments and concerns as raised in CC Docket 95-20.

Respectfully submitted,

THE INFORMATION INDUSTRY
LIAISON COMMITTEE

By Its Attorney:



Susan M. Miller, Vice President
and General Counsel
Alliance for Telecommunications
Industry Solutions, Inc.

IILC Chair - Donald S. Radovich

ATTACHMENT A

Comments Filed in CC Docket No. 95-20

Ad Hoc Telecommunications Users Committee
Ameritech
Association of Telemessaging Services International, Inc. ("ATSI")
AT&T Corporation
Bell Atlantic Telephone Companies
BellSouth Telecommunications, Inc.
California Cable Television Association ("CCTA")
The Commercial Internet Exchange Association
CompuServe, Inc.
Cox Enterprises, Inc.
GeoNet Limited, L.P.
Hatfield Associates, Inc.
Information Industry Association
Information Technology Association of America
LDDS Communications, Inc.
MCI Telecommunications Corporation
National Cable Television Association, Inc. ("NCTA")
New England Telephone and Telegraph Company
 and New York Telephone Company ("NYNEX")
Newspaper Association of America
Pacific Bell and Nevada Bell
Pacific Telesis
Prodigy Services Company
Southwestern Bell Telephone Company
U S WEST, Inc.



Information Industry Liaison Committee

HANDBOOK

November 1994

Sponsored by the Alliance for Telecommunications Industry Solutions

Information Industry Liaison Committee

Handbook

November 1994 Edition

For information about the IILC, please contact:

IILC Secretariat
Alliance for Telecommunications Industry Solutions
1200 G Street, N.W., Suite 500
Washington, D.C. 20005
(202) 434-8825/8821
(202) 393-5453 **FAX**

**Sponsored by
the Alliance for Telecommunications Industry Solutions**

Information Industry Liaison Committee

IILC Handbook

Table of Contents

Section I

Background of the IILC
Organizational Structure and Responsibilities
The IILC's "Going...Going...Gone" Consensus Process

Section II

IILC By-Laws

Section III

IILC Administrative Procedures

AP-001 - Hosting Responsibilities

AP-002 - Meeting Agendas

AP-003 - Pre-Meeting Package Format

AP-004 - Document Identifiers

AP-005 - Official Internal Correspondence

AP-006 - IILC Issue Management

NOTE: AP-007 (Task Group Working Notes), AP-008 (Task Group Meeting Notices and Materials), and AP-009 (Uniform Issue Resolution Documentation) have been incorporated into AP-006

AP-010 - Systematic Approach to Uniformity
of ONA Services

APPENDICES

Diagram of the IILC Consensus Process

Diagram of the Systematic Uniformity Process

Examples of Issue Identification Forms

- Service Requests
- Strategic Issues

Issue Tracking Sheet

Issue Reference Sheet

IAG Representatives

IILC Meeting Calendar

Information Industry Liaison Committee

Section I

Background of the IILC
Organizational Structure and Responsibilities
The IILC's "Going...Going...Gone" Consensus Process

The Information Industry Liaison Committee (IILC) is one of the committees sponsored by the Alliance for Telecommunications Industry Solutions (ATIS), formerly the Exchange Carriers Standards Association (ECSA).

Background of the Information Industry Liaison Committee

ATIS actively promotes the timely resolution of national and international issues involving telecommunications standards and the development of operational guidelines. It maintains flexible, open industry forums, such as the IILC, to address technical and operational issues affecting the nation's telecommunications facilities and services and the development of innovative technologies. It serves as an information resource to its members, the forum participants, federal and state agencies and other interested parties. ATIS promotes industry progress and harmony with minimal regulatory or legislative intervention. Membership in ATIS is open to domestic providers of telecommunications services with a plant investment in transport and/or switching services.

ATIS agreed to sponsor the IILC at the request of the Regional Bell Operating Companies (RBOCs) who learned from non-exchange carriers that there was a common need for an ongoing forum in which interested parties could come together and discuss Open Network Architecture (ONA) issues. The IILC was chartered in October of 1987.

The IILC's mission is to serve as an interindustry mechanism for the discussion and voluntary resolution of industry-wide concerns related to Open Network Architecture (ONA) and/or local network interactivity.

Organizational Structure and Responsibilities of the *IILC*

The organizational structure of the IILC consists of the full IILC, the Interindustry Advisory Group (IAG), and issue-specific Task Groups, with responsibilities as follows:

- The full IILC is the deliberative body of all IILC participants in which final consensus on issues related to ONA is obtained. Other functions of the IILC include issue introduction and definition, ongoing issue review, and industry presentations and tutorials.
- The IAG supervises the administrative, procedural and logistical functions of the IILC, and reviews recommendations from the Task Groups for adherence to the IILC By-Laws and procedures. Its representation corresponds to the interest groups that participate in the IILC.
- The Task Groups develop recommendations and consensus resolutions for issues assigned by the full IILC or for those issues directly raised by participants on the Task Group.

The IILC consensus process begins when an industry representative brings a specific service request or "strategic" issue before the full IILC for consideration.

New issues can also be presented initially to the IAG (Interindustry Advisory Group) or to a Task Group which will subsequently refer these to the full IILC.

The IILCs "Going...Going...Gone" Consensus Process

The issue originator describes the nature of the request to the IILC participants, who debate whether the issue is an appropriate one for the IILC to investigate. If the IILC accepts a new issue, it will be on a pending basis until its Task Group presents a formal issue statement to the IILC. An issue receives a reference number, and a volunteer LEC or non-LEC co-champion is solicited to join the issue originator in leading a Task Group to investigate the issue.

Task Groups consist of issue co-champions (one local exchange carrier (LEC) representative and one non-LEC representative), subject matter experts, and other interested parties. Substantive review of an issue is done at the Task Group level with Task Group progress on issues reported to and tracked by the IAG, and periodic status reports presented to the full IILC. The IILC provides feedback to these status reports until the IILC reaches initial consensus on the Task Group findings and recommendations. The initial consensus resolution is then forwarded to the IAG where it is reviewed for procedural fairness.

The IILCs
"Going...Going...Gone"
Consensus Process

When the IILC reaches initial consensus on a Task Group's findings and recommendations **GOING...**, its initial consensus resolution is then forwarded to the IAG where it is reviewed for procedural fairness.

GOING... Upon completion of this review, the issue resolution is forwarded for final IILC consensus or remanded to the Task Group to correct identified deficiencies. Only issues that have gained final consensus approval by the full IILC may be adopted and distributed as sanctioned IILC positions ...**GONE**.